

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**JAMES DOE,**

*Plaintiff,*

**VS.**

**MICHAEL ARPAIO, THE CITADEL,  
COLONEL JOHN G. LACKEY, III,  
MAJOR WILLIAM BATES, III,  
JENNIFER GARROTT, AND  
ROBERT J. LYON,**

*Defendants.*

**Civil Action No.: 2:13-cv-03446-RMG**

**PLAINTIFF'S RESPONSE TO  
JENNIFER GARROTT'S AMENDED  
MOTION TO DISMISS**

On May 23, 2014, Defendant Jennifer Garrott filed an Amended Motion to Dismiss incorporating arguments that the Plaintiff's claims are barred because 42 U.S.C. § 1983 does not allow for claims alleging supervisory liability. The Plaintiff has fully briefed this issue as it relates to the claims against Defendant Jennifer Garrott within the Plaintiff's Consolidated Response Memorandum to the Two Motions to Dismiss Filed by Defendants Jennifer Garrott and Robert J. Lyon, ECF No. 54, at pages 32 through 43. The Plaintiff respectfully incorporates the arguments set forth in the Plaintiff's Consolidated Response, ECF No. 54, in opposition to Defendant Garrott's recently Amended Motion to Dismiss. (ECF No. 66).

Respectfully Submitted,

s/ Scott C. Evans

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